

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN,

Plaintiff

v.

McCONNELL VALDÉS, LLC;
ANTONIO A. ARIAS-LARCADA, his wife
MARIA BEALE, and the Conjugal
JOHN DOE; MARY DOE
SOMPO INTERNATIONAL INSURANCE
COMPANY; ENDURANCE AMERICAN
SPECIALTY INSURANCE COMPANY;
AIG INTERNATIONAL COMPANY-PUERTO RICO

Defendants

* CIVIL NO.: 24cv01136

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EXHIBIT 1

ALAN GOLDMAN'S DECLARATION

DECLARATION OF ALAN B. GOLDMAN

I, Alan B. Goldman, hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my knowledge and belief:

1. I am a resident of Montpelier, Vermont, where I have lived and worked for over 30 years as a professional planner, builder, and real estate developer. I submit this declaration to the United States District Court for the District of Puerto Rico in connection with my request to be physically present in Montpelier during May 2025.
2. I am the principal owner of the two largest undeveloped land parcels within the Montpelier Growth Center: the Sabin's Pasture parcel (approximately 95 acres) and the Crestview parcel (approximately 519 acres). Together, these properties represent over 600 acres of land that are essential to Montpelier's future housing growth, open space, and recreational planning.
3. These properties are not only central to the City's growth strategy—they have been the focus of my life's work. I have devoted decades of my career to stewarding these parcels through design, planning, community engagement, and public policy dialogue. The City Plan 2025 process is the culmination of these efforts.
4. I served for four years on the Montpelier Planning Commission and have collaborated extensively with City staff, elected officials, engineers, architects, and community members on long-term planning for Montpelier. The City Plan 2025 is a comprehensive planning document governed by Vermont statutory law, specifically 24 V.S.A. § 4384 and Title 24, Chapter 117 of the Vermont Statutes Annotated.
5. Public hearings on the City Plan 2025 are scheduled to occur on May 21 and May 28, 2025. These hearings are statutorily mandated and represent the only opportunity within the current 8-year cycle for stakeholders like myself to offer input, propose revisions, and engage in final deliberations prior to the Plan's formal adoption and referral to the Central Vermont Regional Planning Commission, the Vermont State Senate, and the Governor's Office.
6. I respectfully assert that my physical presence in Montpelier is essential during this process, beginning May 14, 2025. This includes participation in the regularly scheduled City Council meeting and ongoing coordination with City Councilors, planning staff, and the incoming acting City Manager, as the long-serving City Manager of Montpelier is

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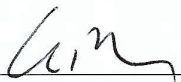
concurrently retiring.

7. My personal and professional knowledge of these properties, coupled with my historic role in their design and strategic planning, makes me uniquely qualified to inform the City's deliberations on these matters. This is not only my right as a property owner, but my civic duty as a long-standing member of this community.

8. I declare that this moment—this hearing process—represents the culmination of over three decades of investment, planning, and collaboration on behalf of the people of Montpelier and the sustainable growth of our Capital City.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of May 2025, at Montpelier, Vermont.



Alan B. Goldman

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